

Greenwashing in Sport: The UCPD's Next Frontier?

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Greenwashing on the pitch

A 'climate neutral' World Cup in Qatar?

Swiss Fairness Commission (June 2023)

Berlin Regional Court (October 2025)

Greenwashing under the UCPD

Article 5 UCPD (1/2)

1. Unfair commercial practices shall be prohibited.
2. A commercial practice shall be unfair if:
 - (a) it is contrary to the requirements of professional diligence,
and
 - (b) it materially distorts or is likely to materially distort the economic behaviour with regard to the product of the average consumer whom it reaches or to whom it is addressed, or of the average member of the group when a commercial practice is directed to a particular group of consumers.

Article 5 UCPD (2/2)

3. [...]
4. In particular, commercial practices shall be unfair which:
 - (a) are misleading as set out in Articles 6 and 7,
or
 - (b) are aggressive as set out in Articles 8 and 9.
5. Annex I contains the list of those commercial practices which shall in all circumstances be regarded as unfair. The same single list shall apply in all Member States and may only be modified by revision of this Directive.

Blacklist, practices deemed unfair, and safety-net clause

Core tools: Annex I (blacklist) & Articles 6–7 (misleading practices)

Guidance from recent case law (e.g., *TotalEnergies* and *KLM*)

Looking ahead

Forthcoming wave of cross-border strategic litigation?

From greenwashing to 'greenhushing'?

Human rights abuse, corruption, and 'sportswashing'